

Department of Transportation

Office of the Secretary

Washington, D.C.

ORDER

DOT 1630.5

12-19-79

SUBJECT: POSITION SENSITIVITY OF PERSONNEL ASSOCIATED WITH DEPARTMENT OF
TRANSPORTATION COMPUTER SYSTEMS

1. PURPOSE. This Order establishes the criteria to be used within the Department of Transportation (DOT) in assigning position sensitivity for personnel who are directly or indirectly associated with the Department's computer systems. Future revisions of DOT 1630.2, DOT Personnel Security Program, will incorporate the policy set forth in this Order.
2. BACKGROUND. The Office of Management and Budget (OMB) recently issued Transmittal Memorandum #1 to OMB Circular A-71, which among other actions, required the Civil Service Commission (now the Office of Personnel Management) to establish Governmentwide position sensitivity standards for personnel associated with Federal computer systems. By Federal Personnel Manual (FPM) Letter 732-7, dated November 14, 1978, this action was accomplished.
3. GUIDELINES FOR APPLYING CRITERIA TO SPECIFIC POSITIONS. Three categories have been established for designating computer and computer-related positions. They are Automated Data Processing (ADP) I, II and III. The investigative requirements for the ADP-I, ADP-II, and ADP-III positions are the same as those for critical sensitive, noncritical sensitive, and nonsensitive positions, respectively. Application of the criteria for designating category levels of individual positions normally does not fit a precise formula. A determination must be made on the basis of judgment, considering numerous factors, including, but not necessarily limited to:
 - a. The degree of supervision or review afforded the occupant of the position;
 - b. the extent of security and protective measures in effect;
 - c. the nature of the data being processed;
 - d. the degree to which the data being processed is accessible by the individual through outside terminals;
 - e. the extent to which responsibility for violations or attempted violations of computer systems security can be established;

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- f. the extent to which the activities associated with the position are performed in isolation from concurrent processes; and
- g. the degree of accessibility to other data in a system through intrusion by telecommunications or time sharing.

4. CRITERIA FOR DESIGNATING POSITIONS. Specific criteria for assigning positions to one of the ADP-I, ADP-II, or ADP-III categories is as follows:

a. ADP-I (Critical Sensitive)

- (1) Responsibility for the development and administration of Departmental computer security programs, and including direction and control of risk analysis and/or threat assessment.
- (2) Significant involvement in life-critical or mission-critical systems.
- (3) Responsibility for the preparation or approval of data for input into a system which does not necessarily involve personal access to the system, but with a relatively high risk for effecting grave damage or realizing significant personal gain.
- (4) Relatively high risk assignments associated with or directly involving the accounting, disbursement or authorization for disbursement from systems of (a) dollar amounts of \$10 million per year or greater, or (2) lesser amounts if the activities of the individual are not subject to technical review by higher authority in the ADP-I category to insure the integrity of the system.
- (5) Positions involving major responsibility for the direction, planning, design, testing, maintenance, operation, monitoring, and/or management of systems hardware and software.
- (6) Other positions as designated by the Secretary that involve relatively high risk for effecting grave damage or realizing significant personal gain.

b. ADP-II (Noncritical Sensitive)

- (1) Responsibility for systems design, operation, testing, maintenance, and/or monitoring that is carried out under technical

review of higher authority in the ADP-I category, to insure the integrity of the system. This category includes, but is not limited to:

- (a) access to and/or processing of proprietary data, information requiring protection under the Privacy Act of 1974, and Government-developed privileged information involving the award of contracts, and
- (b) accounting, disbursement, or authorization for disbursement from systems of dollar amounts less than \$10 million per year.

- (2) Other positions as designated by the Secretary that involve a degree of access to a system that creates a significant potential for damage or personal gain less than that in ADP-I positions.

c. ADP-III (Non Sensitive). All other positions involved in Federal computer activities.

5. IMPLEMENTATION. Departmental personnel security specialists, in conjunction with management and personnel officials concerned, shall be responsible for identifying the affected positions and having them assigned to the appropriate category. ADP-III positions do not need to be identified and reviewed as they equate to the nonsensitive positions category. An incumbent of an ADP-I position who has occupied the position less than one year from the date of this Order, and who has not been the subject of a full field or background investigation, will be required to submit the necessary forms so that such an investigation may be initiated. Any incumbent who has completed one or more years of satisfactory service in an ADP-I position in the Department shall be subject to a review of the Official Personnel Folder, Personnel Security File, a current security questionnaire (SF 86 or equivalent), and any other relevant material regarding the employee. If there is any indication that the employee is not reliable or trustworthy, the issue should be fully resolved, by investigation if necessary, before a determination is made concerning the continued employment of any person in an ADP-I position.

FOR THE SECRETARY OF TRANSPORTATION:



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